

IN THE
SUPREME COURT OF ILLINOIS

MARYAM AHMAD,)	On Emergency Motion
)	for Supervisory Order or
Petitioner,)	for Leave to File Writ of
)	Prohibition or <i>Mandamus</i>
v.)	
)	
ILLINOIS STATE BOARD OF)	
ELECTIONS, and CHICAGO BOARD OF)	
ELECTION COMMISSIONERS, and its)	
Members, MARISEL A. HERNANDEZ,)	
Chairwoman, WILLIAM J. KRESSE, &)	
JONATHAN T. SWAIN, and DAVID ORR,)	
in his official capacity as COOK COUNTY)	
CLERK, and RHONDA CRAWFORD,)	
)	
Respondents.)	

**PETITIONER’S REPLY TO THE ILLINOIS STATE BOARD OF ELECTIONS’
RESPONSE TO THE PETITIONER’S EMERGENCY MOTION FOR SUPERVISORY
ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS**

NOW COMES, Petitioner, MARYAM AHMAD, by and through her attorneys, Odelson & Sterk, Ltd, and in Reply to the Illinois State Board of Elections’ (“SBOE”) Response to the Petitioner’s Emergency Motion for Supervisory Order or for Leave to File Writ of Prohibition or *Mandamus*, states as follows:

1. The SBOE raises “ripeness” as a reason to deny the relief requested.
2. This matter became “ripe” upon the Attorney Registration and Disciplinary Commission’s (“ARDC”) filing of their request for an Interim Suspension of the Respondent, Rhonda Crawford (“Crawford”). (*See, In the matter of Rhonda Crawford*, S. Ct. No. M.R. 28341).
3. This matter is, and will be “ripe” for consideration, if this Court grants the relief

requested by the ARDC. In fact, if Crawford is suspended by this Court, she no longer is qualified to be a candidate and judge.

4. To wait until after the election on November 8, 2016, for relief as requested in this action, would possibly render moot the suppression of votes, and would deprive the voters of the 1st Judicial Subcircuit the opportunity to cast a ballot for a legally qualified candidate.

5. The SBOE discusses “hypothetical facts” at paragraph 8 of their Response. The pertinent facts have already been admitted by Crawford. (*See*, Respondent Rhonda Crawford’s Motion for Extension of Time to Respond to Administrator’s Petition for Interim Suspension Pursuant to Supreme Court Rule 774(a)(2) or for Denial of Interim Suspension with the Clerk of the Attorney Registration and Disciplinary Commission in Chicago, Illinois, *In the matter of Rhonda Crawford*, S. Ct. No. M.R. 28341, ¶12). There is nothing hypothetical about this serious matter.

6. SBOE’s reliance on this Court’s holding in *Simcox v. Simcox*, 131 Ill. 2d 491. 298 (1998) is misplaced. In that case, the Court found the existence of a hypothetical case where issues were prematurely addressed prior to the establishment of a defendant’s status. However, in this case, Petitioner is not asking this Court to prematurely address the issues of Crawford’s candidacy on the November 8, 2016 ballot. The Petitioner is clearly seeking her requested relief, “if this Court suspends Crawford’s license to practice law pursuant to the request by the ARDC.” Thus, the SBOE’s argument of ripeness or this being a hypothetical case should be disregarded by this Court.

7. The SBOE is correct that it would be very difficult to remove Crawford’s name from the ballot at this late date. It is not a difficult task to suppress and not count votes for Crawford. The Chicago Board of Election Commissioners and Cook County Clerk can suppress

and not count votes without burdensome costs and effort. The SBOE is the certifying authority and not the election authority who is responsible for counting – or suppressing votes at the November 8, 2016 election. Those tasks are within the authority of the Chicago Board of Election Commissioners and the Cook County Clerk.

8. The SBOE is an administrative agency of the State and should not be taking a position or advocating for – or against any candidate. *Kozenczak v. DuPage County Officers Electoral Board*, 299 Ill.App.3d 205, 700 N.E.2d 1073, 233 Ill.Dec. 365 (2d Dist. 1998).

WHEREFORE, Petitioner respectfully requests her Petition for Supervisory Order be granted.

Dated this 28st day of October, 2016.

Respectfully submitted,

MARYAM AHMAD, Petitioner

By: /s/Burton S. Odelson
Burton S. Odelson, one of her Attorneys

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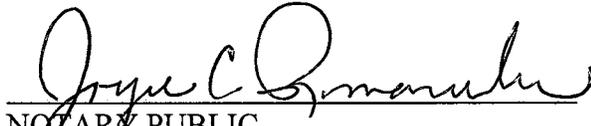
VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that he has read PETITIONER'S REPLY TO THE ILLINOIS STATE BOARD OF ELECTIONS' RESPONSE TO THE PETITIONER'S EMERGENCY MOTION FOR SUPERVISORY ORDER OR FOR LEAVE TO FILE WRIT OF PROHIBITION OR MANDAMUS and the statements set forth therein are true and correct, except as to matter therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



 Burton S. Odelson

Subscribed and Sworn to before me
this 28th day of October, 2016.



 NOTARY PUBLIC


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